



STATE OF UTAH  
NATURAL RESOURCES  
Oil, Gas & Mining

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December 5, 1985

CERTIFIED RETURN RECEIPT REQUESTED  
(P402 457 267)

Mr. Ronald H. Baldwin  
Interstate Brick Company  
9780 South 5200 West  
West Jordan, Utah 84084

Dear Mr. Baldwin:

RE: Completeness Review of Updated MR-1 Form, Jim Gay Mine  
Permit Application, ACT/049/005, Utah County, Utah

The Division has completed the initial review of Interstate Brick Company's updated MR-1 Permit Application for the Jim Gay Clay Mine (received September 20, 1985). The following review comments identify specific technical deficiencies which must be addressed by the operator before the permitting process can continue.

Rule M-3(1)(f) - LK

While the Division appreciates the fact that it is impossible to give an exact time (date) for reclamation, the operator should discuss each phase of reclamation in terms of approximate dates (months or season) of when tasks will begin and be completed.

Rule M-3(2)(a) - JSL

The volume of current substitute soil material available must be provided. A soil survey and a map of adequate scale should be generated by the operator. All proposed substitute soil stockpiles attendant to the mining operation for the term of the permit should be expressed on this map. Each soil sample point should be identified and correlated with the analytical data submitted. Because no further disturbance will occur, an order 3 soil survey will be adequate.



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Rule M-3(c)(1) - JSL

The operator must submit plans for the protection of the substitute soil stockpiles from wind and water erosion, contamination and compaction. The plan should include a seed mix and ratio.

Rule M-3(f) - JSL

The operator must state the length of time that will occur between substitute soil redistribution and revegetation. The operator should also include plans for contemporaneous reclamation.

Rule M-5 - Surety Guarantee - RH

Please find enclosed adjusted bond calculations which reflect additional costs to be incurred should the state be required to reclaim the site.

Rule M-6 - JSL

The operator must include a map showing the areas that will be topdressed with a substitute soil material and those areas that will not receive such material. The operator must include on this map the potential distribution areas of the dump material topsoil substitute and the South Bank Hill topsoil substitute.

Rule M-10(12) - JSL

The fertilization schedule submitted is not acceptable. All required nutrients (only 25 percent of nitrogen recommendation) should be incorporated in the fall before or at the time of seeding. The residual nitrogen recommendation should be broadcast in early spring.

Rule M-10(14) - JSL

The operator stated in the MR-1, 23D, that roads will be scarified. Because of the compaction to the soil, the applicant must include plans for ripping to a minimum depth of 12 inches on the road areas. It is recommended that one ton per acre of an alfalfa-straw mix be chiseled in to increase aeration and tilth. On those sites where substitute material will be used as a topdressing, the underlying clay material should have the alfalfa-straw mix chiseled in.



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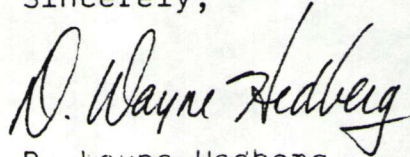
The South Bank Hill substitute topsoil material has an unacceptable SAR (23) for classification as a suitable substitute soil material. The discing of 19.4 tons per acre of gypsum will lower the SAR to an acceptable range. A commitment to such a plan must be implemented for this material.

Rule M-10(5) - Highwall Variance - RH

The operator's request for a variance from the backfilling requirements for the limestone highwall has been adequately justified and is hereby granted.

Please provide a response to the comments outlined above by January 9, 1985 if possible. An expeditious response will help speed the permit review and approval process. Thank you for your cooperation and patience in finalizing this permitting activity. Should you have specific questions or need additional information, please contact me.

Sincerely,



D. Wayne Hedberg  
Permit Supervisor/  
Reclamation Hydrologist

btb

Enclosure

cc: L. Braxton  
R. Harden  
D. Hooper  
L. Kunzler  
J. Leatherwood  
D. Wham

8992R-81-83